

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**EDWARD BAGLEY, SR.**

**Defendant.**

**Case No. 10-00244-01-CR-W-DW**

**MOTION OF DEFENDANT EDWARD BAGLEY, SR.  
FOR AUTHORIZATION OF FUNDS TO RETAIN INVESTIGATOR**

COMES NOW Edward Bagley, Sr., by and through his undersigned attorney, and moves the Court for its order authorizing payment of fees to hire an investigator.

IN SUPPORT of this Motion, Defendant states:

1. On September 7, 2010 the Grand Jury sitting in the Western District of Missouri returned an eleven count indictment charging five defendants, including Defendant Bagley, with multiple counts related to sex trafficking.

2. Defense counsel has identified numerous witnesses, both within and outside the Western District of Missouri, who will need to be interviewed. Counsel anticipates that those interviews will lead to the identification of many more witnesses who will also need to be interviewed.

3. This motion is for preliminary authorization of funds in that it is anticipated that upon completion of interviews with the currently known witnesses, additional funds will be required to complete all necessary investigation.

WHEREFORE, Defendant Edward Bagley, Sr. prays this Court for its order authorizing the expenditure of funds necessary to retain an investigator.

Respectfully submitted,

s/s Susan L. Dill  
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ATTORNEY FOR DEFENDANT  
EDWARD BAGLEY, SR.

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to Assistant United States Attorney Cynthia Cordes as well as all defense counsel of record.

s/s Susan L. Dill  
Susan L. Dill